

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

THIS DOCUMENT RELATES TO:

*Gaston Roberts et al. v. Zhejiang
Huahai Pharmaceutical Co., et al.,*

Case No. 1:20-cv-00946-RBK-JS

MDL No. 2875

Honorable Renée Marie Bumb
District Court Judge

**DEFENDANTS' NOTICE OF MOTION TO EXCLUDE THE OPINIONS OF
DR. JOHN RUSSO**

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel will bring Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc.'s ("Defendants") Motion to Exclude the Opinions of Dr. John Russo before this Court. Defendants will ask for entry of an order that excludes all of Dr. Russo's proffered opinions in this case.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Nina Rose, Esq., together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 22, 2025

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (*pro hac vice*)

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Pharmaceutical Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2025, a true and correct copy of the foregoing document was served upon counsel of record via operation of the Court's electronic filing system.

Dated: May 22, 2025

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (*pro hac vice*)

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